

**IN THE UNITED STATES DISTRICT COURT FOR
THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

KENNETH PRITCHARD,

Plaintiff,

v.

METROPOLITAN WASHINGTON
AIRPORTS AUTHORITY

Defendant.

Civil Action No. 1:18-cv-1432-AJT-TCB

**MEMORANDUM OF POINTS AND AUTHORITIES IN SUPPORT OF PLAINTIFF
KENNETH PRITCHARD’S AND DEFENDANT METROPOLITAN WASHINGTON
AIRPORTS AUTHORITY’S JOINT CONSENT MOTION TO EXTEND TIME TO
MAKE RULE 26(a)(3) DISCLOSURES**

COME NOW, the Plaintiff Kenneth Pritchard (“Pritchard”) and the Defendant Metropolitan Washington Airports Authority (“Airports Authority”), by their respective counsel, and file this Memorandum of Points and Authorities in support of their Joint Consent Motion to Extend Time to Make Rule 26(a)(3) Disclosures, and in support thereof, state as follows:

1. On March 26, 2019, this Court issued its Initial Scheduling Order, permitting discovery to begin in the case. Under this Court’s Order, discovery closed on August 9, 2019.
2. Although the parties responded to each other’s written discovery requests and took depositions prior to the close of discovery, both parties have been, and still are, supplementing their previously made written discovery responses. Additionally, there have been a large number of documents produced in this case, the review of which has not been completed by the parties.
3. As such, the parties are concerned that any Witness and/or Exhibits Lists filed under Rule 26(a)(3) by the Final Pretrial Conference tomorrow morning may be incomplete.

4. Therefore, the parties hereby request an enlargement of time to make disclosures under Rule 26(a)(3) of three weeks, or until September 11, 2019.

5. The parties are optimistic that this brief extension will allow them to complete discovery supplementation and their review of documents, and to ensure their Witness and Exhibit lists under Rule 26(a)(3) are complete.

6. The parties do not believe this brief extension will prejudice the Court's schedule or cause any undue delay of the trial of this matter, and that the granting of the extension will permit the parties to have a full and fair trial on the merits.

7. This is a Joint Motion, and both parties have consented to its filing and request the relief stated herein.

WHEREFORE, for the above good and valid reasons, Pritchard and the Airports Authority respectfully request that their Joint Motion to Extend Time to Make Rule 26(a)(3) Disclosures be granted.

Respectfully Submitted,

FRIEDLANDER MISLER, PLLC

/s/ Joseph W. Santini

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that, on the 21st day of August 2019, I sent the above
Memorandum of Points and Authorities in Support of Joint Consent Motion via the Court's ECF
system, to:

Richard Renner, Esq.
James M. Eisenmann, Esq.
Nina Y. Ren, Esq.
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/s/ Joseph W. Santini

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